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67369

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	NOLAN J. GUIDRY/12/12/96	771	02-20-1999	02-20-1997	1
	REED D. WILLIAMS/1/21/97	771	02-20-1999	02-20-1997	1
	GARY BURN/11/08/96	781	11-19-1999	11-19-1996	2
	D. C. MCCANTS/11/09/96	781	11-D-1991	11-U-1996	1
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	MICHAEL A. LAWE/11/12/96	781	11-19-1991	11-19-1996	7
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	BILL HAINES, JR./1/29/97	786	02-20-1999	02-20-1991	4

USCG 99-6224-45

(Name) DAVID E. HAMMOND
 (Mailing Address) P.O. BOX 598
 (City/State) HEBRON, KY 41048
 (Date) 10-16-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
 United States Coast Guard Headquarters
 2100 Second Street, SW
 Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

MASTER'S RESPONSIBILITIES SHOULD BE
CLEARLY & COMPLETELY DEFINED.

THE HORSEPOWER BREAK SHOULD REMAIN @
3,000.

Signature:

David Hammond

(Attach additional pages) 666

(Name) Robert C. Harrison
(Mailing Address) P.O. Box 133
(City/State) 112 E. 4th St., Kc 64105-9
(Date) 10-12-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

Reason, b2, c, f & h. After the
The proposed H.P. 2a, no. B, 2aK should
B. 2000 H.P.

Signature: Robert C. Harrison (Attach additional pages)

667

(Name) C. J. STARR
(Mailing Address) 1125 GLENHOLM
(City/State) GA 30108
(Date) 10/16/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towin Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towin Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

CLARIFY MASTERS RESPONSIBILITY

INDIVIDUAL CURRENTLY DOING WHAT HIS LICENSE
CALLS FOR SHOULD NOT HAVE TO DEMONSTRATE
HIS PROFICIENCY AT RENEWAL TIME.

Signature:

C. J. Starr

(Attach additional pages)

668

(Name) John H. Newman
(Mailing Address) PO Box 465
(City/State) Augusta GA 30601
(Date) 10/10/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

1. Master's responsibilities should be clearly stated
in Regulations.

2. Towing vessels should remain at 3000 lbs.

3. Annual qualifications should be based on
service time or demonstration of proficiency.

Signature: John H. Newman

(Attach additional pages)

669

(Name) DANIEL S. WILLIS
(Mailing Address) 6721 RIVER ROAD
(City/State) HEBEN, KY 41018
(Date) 10-16-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

1. THE HORSEPOWER BREAKPOINT SHOULD BE HIGHER THAN 3000 (5000).
(2) TWO BREAK POINTS POSSIBLE 100-3000, 3000 TO 5000, (5000-UNLIM.)
2. MASTER SHOULD NOT HAVE FULL RESPON. FOR PILOTS WATCHSTANDING PERFORMANCE — SHOULD BE MADE CLEAR IN RULES.
3. THE RENEWAL PROCESS SHOULD NOT INCLUDE A SIMULATOR —
SHOULD BE A DEMO OF PROF. ONBOARD THE VESSEL.
(SUGGEST MASTER HARBOR) (OF SEVERAL MILES) (OR LOCKING)
OR AN ACCIDENT FREE, + SERVICE TIME PROVEN FOR 5 YRS — ^{MIN} 3 YRS.
4. SUGGEST GRANDFATHERING OUTV TO MASTER — WITH COMPANY LETTER
+ ACCIDENT FREE
5. THE GEOGRAPHICAL LIS. RESTRICTIONS SHOULD COINCIDE WITH HP RES.
EXAMPLE: A LOUVER MISS. PILOTS — UNLIMITED HP MILE 0 TO 947
B) OHIO RIVER MILE 0 TO 981 — UNLIMITED
C) HARBORING — 3000 HP — CINTI TO HUNT. / LOUISVILLE TO HUNTINGTON, ETC.

Signature:

Daniel Willis

(Attach additional pages)

670

Dear: Sirs

10-14-96

I would like to voice
my objection to your
new Licensing Proposal.
We would end up with
more work, more stress.
The Proposal will not
make us Better Pilots,
We have a very good
track Record in the industry
AS much tonnage as we push
up And down the waterways
is unmatched in any other
industry Thank you For
your time and vote no

Thank you

Chris Runyon
Chris Runyon 671

Max E English
1060 Belhaven Dr
Russell Ky 41169-1670
License # 31448
OCT 16 1996

TO: Executive Secretary Marine Safety Council
(G-LRA / 3406) (CGO 94-055)
United States Coast Guard Headquarters
2100 Second Street SW
Washington DC 20593-0001

Subject: my comments on 46CFR 10 and 15 Proposed
Rulemaking on Licensing And Manning For
Officers of Towing Vessels

Gentleman

I request the comment period be
reopened for 180 days for the new proposed
rulemaking

- 1- I feel strongly that we should have a Public
Hearing in the old 2nd Coast Guard District
Western Rivers
- 2 The Notice of Proposed rulemaking on License
and manning was slow in getting out to
The mariners we need more time to study
And comment on the Proposed rulemaking (672)

- 3- I have concerns with the Gray Area in the Increased Master Responsibility
- 4- I have concerns with the Proposed 3,000 Horse Power Break Point, I would consider the Lower 1200 H.P. Break Point. Much more study needs to go into the Horse Power Breakpoint
- 5- I have concerns with the designated examiner for Proficiency. How much experience will they have? What License will they hold? Who will appoint them?

There is some rough spots in the Proposed Rulemaking. With additional time and a Partnership working relationship The Coast Guard, TSAC And the regulated Industry can work the rough spots out of the Proposed Rule making.

Truly yours
Mae E English

C.C. Admiral J.C. Card

(Name) Franklin Beagle
(Mailing Address) 900 Center St.
(City/State) Cape Mudge, B.C.
(Date) 10/17/86

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towina Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

As an owner and operator of a Harbor
Service Vessel 217 who have I strongly recommend
a review and comment period on the new
Revised Rules of Licensing and Manning for
Towing Vessels for western B.C. We would
most request more input from fishermen
actually working at Dore Point and Barkham
Point on the basis for qualified operators.

Signature: Franklin Beagle

(Attach additional pages) 673

(Name) JAMES P. JARRELL
 (Mailing Address) P.O. Box 548
 (City/State) MASSON W Va
 (Date) 10-17-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
 United States Coast Guard Headquarters
 2100 Second Street, SW
 Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towin Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towin Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I feel as an OOTV OPERATOR on the
WESTERN Rivers that TE-SAK has not
represented the BEST INTERESTS OF THE
River Industry AND the proposals of License
Divisions. I AS AN individual I would like
to SEE A period EXTENDED to REVIEW.
RULE MAKING comprised of LICENCED OPERATORS.
that the RULEmaking will Affect.

The best interest of government. AND Industry
will both. be SERVED if a cooperative joint
effort may be reached by All experienced personal
envolved.

Signature:

James P. Jarrell
OOTV #88524.

(Attach additional pages)

674

(Name) Mark Whalen - Pilot Crouse Corp
 (Mailing Address) 2314 Glen Drive
 (City/State) Maysville Ky
 (Date) 10/17/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
 United States Coast Guard Headquarters
 2100 Second Street, SW
 Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I would first recommend extending the comment period. There ARE numerous problems that have not been properly addressed by those most qualified to do so. A work group consisting of experienced captains and the USCG should be formed.

I would further recommend that horsepower rating be removed from licensing. All the horsepower in the world will never take the place of common sense & experience.

Licensing for Western River pilots should be completely removed from licensing for "blue water" pilots.

Signature: Mark Whalen

(Attach additional pages)

05 17

(Name) James L. H. Smith
(Mailing Address) Box 161
(City/State) Point Pleasant, W. Va.
(Date) Oct 17 - 96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I am a Pilot on Western River that
RAK has not represented that he is not
to Western River. you need more people
in given industry to talk for us

Signature: (Attach additional pages)

676

(Name) _____
(Mailing Address) _____
(City/State) _____
(Date) _____

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towinu Vessels.

Gentlemen,

WE have read the Notice of Proposed Rulemaking concerning the Licensing and Manninu of Towinu Vessels. I would also like to make the following personal comments to the public docket about this rulemacking:

WE RECOMMEND THAT WE HAVE A RE-OPENING OF THE COMMENT PERIOD FOR THIS NOTICE OF PROPOSED RULEMAKING.

DURING THE NEW COMMENT PERIOD WE FURTHER RECOMMENDS THAT LEOR DAN DALLY OR REPRESENTATIVES MEET WITH WORK GROUPS MADE UP OF WORKING WESTERN RIVERS PILOTS AND CAPTAINS TO RECIEVE PERSONAL INPUT FROM THESE VERY EXPERIENCED PEOPLE WHO IN FACT ARE MOST IMPACTED BY THESE PROPOSALS.

WORK GROUPS ARE ALREADY ESTABLISHED IN THE PITTSBURGH AND HUNTINGTON AREAS AND WILL SOON BE SET UP IN THE LOUISVILLE, Ky. AREA.

David K. Smith

John R. Smith

Marlin Chaplin

Timothy M. Boyd

Ray Thomas

Richard B. Boyd

Signature: _____

(Attach additional pages)

677

Michael D. Leach

Max E. English

James A. White

John Kirkland

Brad Thomas

Samuel Lee

Donald R. Gordon

Signature: _____

(Attach additional pages)

677

(Name) Buckley D. Jeffers
(Mailing Address) Rt. 1 Box 151-B
(City/State) Buffalo, W.Va. 25033
(Date) Oct. 17-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I feel that as an ^{operator} O.T.V. that TE-Sak has not represented the western Rivers operators - Capt. + Pilots in a fair way. With no hands on experience of day-to-day conditions involved with operations

Signature: Buckley D. Jeffers

(Attach additional pages) 678

(Name) JAMES G. GOODMAN JR
(Mailing Address) PO Box 23
(City/State) POINT PLEASANT, W.VA 25550
(Date) 10/17/96

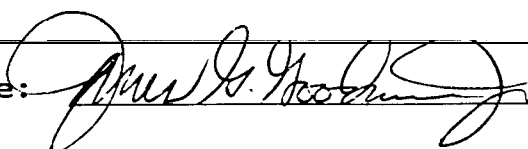
TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I AS A OUTV OPERATOR ~~RE~~ DISAGREE WITH TE-SAK THAT THEY DO NOT HAVE THE BEST INTEREST OF THE INLAND RIVER RIVER INDUSTRY, AND THAT THERE SHOULD BE MORE INPUT BY THE OPERATORS OF TOWING VESSELS ALSO THERE SHOULD BE MORE DISCUSSION ON LICENSES REVIEWS.

Signature: 

(Attach additional pages)

679

(Name) ALAN P. HALL
(Mailing Address) #2, Fort Amherst, D.C.
(City/State) Charleston WV 25306
(Date) 10/17/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towinu Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manninu of Towinu Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

1) Reopen the comment period.

2) HAVE INDUSTRY PILOTHOUSE PERSONNEL INVOLVED IN RULEMAKING.

3) Omit the HP requirement.

Signature: Alan P. Hall

(Attach additional pages)

680

(Name) CHARLES T. JONES
(Mailing Address) 102 PORT AMHERST DR.
(City/State) CHARLESTON W. V. 25306
(Date) 10/17/96

00 17

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

- 1) Reopen the comment period
- 2) Include industry pilots personnel involved in rulemaking.
- 3) Omit the HP requirement.

Signature: Charles T. Jones

(Attach additional pages)

681

(Name) Samuel D. Budgwick
(Mailing Address) RT 1 Box 253 A
(City/State) New Matamoras OH 45767
(Date) 10/17/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Mannino for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Mannino of Towinu Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

Se Attached

Signiture:

Samuel D. Budgwick

(Attach additional pages)

Comments

The 3000 hp Rule does not make sense. I have run boats from 600 hp. to 4300 hp but currently work on a 600 hp boat. In 20 years when I retire from this company it sounds like I won't be qualified to run a bigger boat without changing my license which would require a lot of time + money. (unfair.)

The new training proposal sounds unfair also, for a company to train new pilots the time + money spent on doing so could force a company not even to try to train someone.

Samuel O. Buckenick

(Name) Don Gaston
(Mailing Address) 4309 11TH Ave
(City/State) Parkersburg W Va
(Date) 10-17-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and
Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing
and Manning of Towinu Vessels. I would also like to make the following
personal comments to the public docket about this rulemacking:

Attached

Signature: Don Gaston

(Attach additional pages)

683

Dear Sir

I feel the amount of time required for steering under supervision is excessive. This will limit companies ability and willingness train new pilots & work as a supervisor at a power plant and our pilots operate in a limited area. Under the current rules a man must spend 40-80 days on deck and 90 days steering. When the trainee is on deck a company is getting use from him while training. To make it so a man has to spend 30 months in the pilot house before he can be left alone will be very cost prohibitive.

Ron Easton

I feel instead of changing any license requirements - the people involved in the accidents should be held accountable instead of making everyone pay.

(Name) Robin Strickland
 (Mailing Address) PO Box 124
 (City/State) Glasgow, WV 25086
 (Date) 10-17-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
 United States Coast Guard Headquarters
 2100 Second Street, SW
 Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I do not feel that T-SAK is adequately representing our interests of the Western River Operators. I would like to propose that a work group of Western River Operators be comprised and meet with Coast Guard Officials to better evaluate and determine necessary changes for the licensing program.

I would like to see this issue re-opened in order to allow a fair representation for the Western River Operators.

Signature: Robin Strickland

(Attach additional pages)

P.O. Box 1323
ASHLAND, Ky 41105
OCTOBER 17, 1996

EXECUTIVE SECRETARY, MARINE SAFETY COUNCIL (G-LRA/3406)(CGD-94-055)
UNITED STATES COAST GUARD HEADQUARTERS
2100 SECOND STREET, SW
WASHINGTON, D.C. 20593-0001

GENTLEMEN,

IN REGARD TO THE NOTICE OF PROPOSED RULEMAKING CONCERNING THE LICENSING AND MANNING OF TOWING VESSELS, I HAVE READ THE DOCUMENT, AND WOULD LIKE TO MAKE THE FOLLOWING COMMENTS TO THE PUBLIC DOCKET ABOUT THIS RULEMAKING.

FIRST OF ALL I REQUEST A RE-OPENING OF THE COMMENT PERIOD ON THIS NOTICE OF PROPOSED RULEMAKING FOR AN ADDITIONAL 180 DAYS. THIS IS VERY NECESSARY DUE TO THE PROBABLE IMPACT OF THE PROPOSED RULES ON THE WESTERN RIVERS INLAND TOWING INDUSTRY, AND THE FACT THAT INFORMATION ABOUT THIS NPRM HAS BEEN VERY SLOW GETTING OUT TO THOSE WORKING IN OUR INDUSTRY WHO WILL BE MOST EFFECTED BY THESE PROPOSED RULES.

DURING THE PAST 120 DAYS PROVIDED AS A COMMENT PERIOD MANY WORKING PILOTS HAVE SPENT 60 OR MORE OF THOSE DAYS ABOARD A VESSEL AND HAVE HAD TO CONTEND WITH HIGH WATER CAUSED BY HEAVY

685

(2)

RAINS AS THE REMNANTS OF HURRICANE FRAN MOVED THROUGH OUR AREA. HIGH WATER PERIODS CAUSES PILOTS TO HAVE TO FOCUS THEIR ENTIRE ATTENTION ON THE DUTIES OF SAFE NAVIGATION, MAINTAINING ~~SECURE~~ FLEETS, AND ABOVE ALL THE SAFETY OF THE BOAT AND CREW LEAVING LITTLE TIME TO STUDY OR RESPOND TO CONFUSING GOVERNMENT DOCUMENTS.

DURING THE PROVIDED COMMENT PERIOD WE HAVE ALSO BEEN CONCERNED WITH AN INTERIM FINAL RULE REGARDING RADAR, A FINAL RULE ON SAFETY EQUIPMENT AND A RECENTLY SIGNED AUTHORIZATION BILL WHICH INCLUDED AN OUTRAGEOUS PROPOSAL OF PRIVATIZATION OF USCG TESTING. WE ALSO HAVE NOT HAD A PUBLIC MEETING WITHIN THE BOUNDARY OF THE FORMER SECOND COAST GUARD DISTRICT.

I DO NOT AGREE WITH THE PROPOSED HORSEPOWER BREAK POINT. RESTRICTING LICENSE ON A BASIS OF HORSEPOWER WILL DO NOTHING TO ENHANCE SAFETY ON THE WESTERN RIVERS. THE COMPANY I WORK FOR WILL NOT LET ANYONE PILOT A VESSEL WITHOUT FIRST ENSURING THAT THEY CAN HANDLE THAT BOAT AND TOW BY LETTING THEM WORK UNDER A PILOT (CAPTAIN) ON THAT PARTICULAR BOAT. THIS IS THE ONLY SURE WAY TO HAVE AS SAFE A SYSTEM AS POSSIBLE

THE COAST GUARD NEEDS TO WORK CLOSELY WITH A WORK GROUP MADE UP OF WORKING PILOTS DURING THE STUDY OF THIS PROPOSAL. EVEN THOUGH THE COAST GUARD LOVES TO TALK OF "PARTNERSHIP" - WE HAVE NOT SEEN THAT THROUGH THIS PROPOSAL. IN MY AREA WE

HAVE THE WATERWAYS ASSOCIATION OF PITTSBURGH,
THE THREE RIVERS NAVIGATION NATURAL WORK GROUP,
THE WATERWAYS ADVISORY COMMITTEE, HUNTINGTON DISTRICT,
THE NAVIGATION WORK GROUP OF HUNTINGTON, AND THE
OHIO RIVER ICE COMMITTEE, NONE OF THESE
GROUPS WERE CONSULTED, WHICH WOULD HAVE RESULTED
IN A MUCH BETTER PROPOSED RULE.

AS REGARDS ECONOMIC IMPACT - THIS PROPOSED
RULE WOULD FINANCIALLY STRAND ENTRY LEVEL PEOPLE
WISHING TO BECOME PILOTS BY MAKING IT VERY
DIFFICULT TO ACHIEVE THEIR DESIRED LEVELS OF
PROFICIENCY AND DEPRIVING THE INDUSTRY OF
COMPETENT PEOPLE.

AGAIN - PLEASE RE OPEN THE COMMENT PERIOD
FOR AN ADDITIONAL 180 DAYS

THANK YOU -
David K. Smith
DAVID K. SMITH

CC: ADMIRAL J.C. CARD
CONGRESSMAN JIM BUNNING
SENATOR MITCH MCCONNELL
SENATOR WENDUR FORD

(Name) Ralph L. Louk
 (Mailing Address) 16078 SUSAN Dr.
 (City/State) EAST Liverpool OH. 43920
 (Date) Oct 16 - 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
 United States Coast Guard Headquarters
 2100 Second Street, SW
 Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen.

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I am a 48 year old male who has served my Country
and have worked hard to raise a family, provide a good
home and education for my children. I have seen in my
life time how government restrictions, Regulations are
overall (unnecessary bureaucracy how cost business, with the
response of bureau (static) red tape. It is the small
businesses inability to absorb the cost. When such an
occurrence like this takes place it affects thousands
of towing vessel operators and when we take in account
their families, tens of thousands.

I feel it is extremely upsetting that I have operated
towing vessels for 23 yrs. Without as much as a minor scratch
and yet the government wishes to penalize myself and others
like me in the same position.

I would appreciate more information concerning the legislation

Signature: Ralph L. Louk (Attach additional pages)

.. Proposals which has a lot of working people worried and will affect the lifestyle and pocket books of each one of us.

It would only be just to have an extension of the present license much time as possible to overview the legislative changes.

(Name) Billy E. Simpkins II
(Mailing Address) Rt. 1 Box 160
(City/State) Pt. Pleasant WV 25550
(Date) 10-17-96

097 17 17

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I would also like to make the following personal comments to the public docket about this rulemaking:

I do NOT FEEL T-SAC IS REPRESENTING, US PILOT'S ON
THE WESTERN RIVERS. I WOULD GLADLY DONATE MY TIME TO ANY
GROUP THAT WOULD MEET WITH CG. TO REPRESENT THE WESTERN RIVER
INTEREST. MOST ALL THE ACCIDENTS THAT ARE BEING USED TO
BRING ABOUT CHANGES TO OUR LICENSE. IS COSTAL ACCIDENTS. NOT
WESTERN RIVER OR EVEN RELATED TO WESTERN RIVERS. I ALSO
SEE NO BENEFIT IN THE THREE DAY RADAR COURSE. I HOPE
THE COMMENT PERIOD IS EXTENDED.

Signature: Bill Simpkins

(Attach additional pages)

687

OCT 17

From: Donald A. Ryan
 10915 S. Jefferson St.
 Princeton, Kentucky 40374
 10/14/96

To: Executive Secretary, Maritime Unit, Council
 (6-LRA/3406) (CGD 74-185)
 UNITED STATES COAST GUARD MARITIME SAFETY OFFICE
 2100 Second Street, SW
 Washington, D.C. 20543

Subject: My Comments on Notice of proposed Rulemaking on
 Licensing and Manning For Towing Vessels

Gentle man,

I have read the Notice of proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because, I do not have a copy of 46 C.F.R. Parts 10015 and since only changes to the Regulations are cited in NPRM on Pages 31341 through 31347. I request that a public meeting be held at the United States Coast Guard Maritime Safety Office after adequate public notice to all towing interest to fully explain and discuss all aspects of this Rulemaking. I further request that you mail me a copy of the final rule at the address below published.

I would also like to make the following comments to the public notice about this Rulemaking

A- Masters being held responsible 24 hours a day.
 I object to this because if a person is asleep, they are not responsible for their actions, a person cannot be held responsible for someone's else's actions, when he or she is not aware of them.

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Page 2 of 11

US CFR Part 10

(B) Levels of Licensing.

IT works now, why break it.

(C)

I STRONGLY Object To Mandatory Ratings.

A lot of good pilots can be restricted due to this. Most companies are general Maintenance Entries. There should be no ratings.

(D)

Qualified Expert.

How can a person w/ long Time & Experience judge a person with 20 or 30 years Experience. Leaves alot of room for the "My Friend" "I'll take care of you" Check.

(E)

Create a lot of Expense for the man trying to better himself & cost for companies who already have good & reliable Expert Pilots w/ years of Experience. Just make "Army, Marine" for the Schools & Government.

I Thank You For Your Time

Sincerely

Donald D. Ryan

Honorable D. Ryan

Rel. Conf. Only For States



CROUNSE CORPORATION

River Transportation

102 WEST SECOND STREET
MAYSVILLE, KENTUCKY 41056
PHONE 606 - 564-6843

October 16, 1996

Rear Admiral J. C. Card
U.S. Coast Guard, Chief
Marine Safety and Environmental Protection
U.S. Coast Guard Headquarters
2100 Second Street SW
Washington, DC 20593-0001

Re: (CGD 94-055)

Dear Rear Admiral Card:

Crounse Corporation appreciates the opportunity to respond to the U.S. Coast Guard's Notice of Proposed Rule Making on Licensing and Manning for Officers of Towing Vessels. We are also in support of efforts to upgrade licensing standards, recognizing **that** operator competence is an important role when it comes to preventing vessel accidents.

However, in responding to the licensing and manning for officers of towing vessels proposal listed in (CGD 94-055) 46CFR Parts 10 and 15, we would like to make the following suggestions and comments.

Part 10.463 General requirements for licenses for master, pilot, and apprentice steersman of towing vessels.

Crounse Corporation does not believe that horsepower separation should be a criteria for license requirements. We feel that the better criteria would be training skills, practical experience, and knowledge of route. These should prove the applicant's qualifications and nullify any requirement for horsepower restrictions. We feel that this restriction would put undue hardships on companies that operate a variety of horsepower vessels. It would limit their ability to utilize their personnel for the **most** safe and efficient operations.

689

Part 10.464 Licenses for masters of towing vessels.

Crounse Corporation will be in opposition to the 48 months of total service ~~time~~ to become a master, if this is meant to be the time frame used between pilot and upgrade to master. With the service requirements for steersman and pilot, we feel that 24 months additional service is long enough to qualify for a masters license. We think that 48 months would restrict our ability to advance pilots from within our company. We would then have to hire outside masters who are not familiar with our operation and would require additional training.

Part 10.464 (a)1ii, 2, 2(b), 2(b)1ii, (b)2, (c) Crounse Corporation opposes any reference to horsepower restrictions in the subparts listed above.

Part 10.464 (c)2 Crounse Corporation does not believe that submitting evidence of practical demonstration of skills in the form of a training and assessment record book, as described in 10.304 (e), would be any better evidence of qualifications than the official documentation and logs from the vessel or vessels on which he/she has served. We feel that if a pilot fulfills the necessary service requirements for a masters license, then he has a permanent record in the form of the vessel log. It shows routes, ~~times~~, and tows that they have handled. The U.S. Coast Guard would have a record of any accidents or violations which the pilot ~~may~~ have acquired. We feel that two letters of recommendation from active masters under whom he has served and a letter from the company would be sufficient.

10.465 Licenses for mates (pilots) of towing vessels.

10.465 (a), (a)1ii, (a)3, (a)3(b), (a)3(b)3, (a)(c), (a)(d) Crounse Corporation opposes any reference to horsepower restrictions in the subparts listed above.

General Overview:

Demonstration of proficiency. Crounse Corporation does not believe that mandatory use of simulators will better demonstrate proficiency. We feel that the training program we currently have is more than adequate. The best place to demonstrate proficiency is on board an active vessel with a designated examiner. We feel that the simulator should be used as a training tool only.

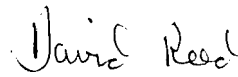
Designated examiner. Crounse Corporation supports this idea, but feels that it should be a person within the company (i.e., a port captain or experienced master who meets the definition of Designated Examiner in 10.103).

Grand-fathering. Crounse Corporation supports the idea of grand-fathering current license holders, if current license holders will be grand-fathered as masters. Otherwise, this will put undue restrictions on our use of personnel.

Responsibility of master and pilot. Crounse Corporation feels that the master should be responsible for the overall operation of his/her vessel and his/her watch - based on a two-watch system, six hours on and six hours off. In addition, the pilot, because of the two-watch system, should be responsible for the safe navigation of his/her own watch, unless following direct orders from the master.

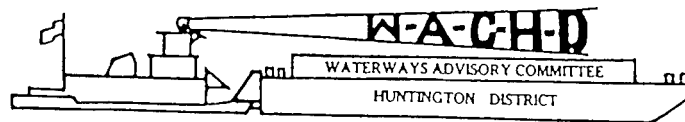
In summary, there are several complex issues listed in the Federal Register concerning licensing. Due to these varying and complex issues, along with their long-range effects on both the navigation industry and the individual license holder, we request a re-opening of the comment period. This would allow more time for concerned licensed individuals and other interested groups to better understand the proposals and make comments.

Sincerely,


David Reed
Port Captain

DR:ds

cc: LCDR Don Darcy
U.S. Coast Guard



PHONE:
(606) 564-6643

102 West Second Street
Maysville, Kentucky 41056

October 16, 1996

LCDR Don Darcy
U.S. Coast Guard Headquarters
2100 Second Street SW
Washington, DC 20593-0001

Re: (CGD 94-055)

Dear LCDR Darcy:

The Waterways Advisory Committee Huntington District appreciates the opportunity to respond to the U.S. Coast Guard's Notice of Proposed Rule Making on Licensing and Manning for Officers of Towing vessels. We are also in support of efforts to upgrade licensing standards, recognizing that operator competence is an important role when it comes to preventing vessel accidents.

However, in responding to the licensing and manning for officers of towing vessels proposal listed in (CGD 94-055) 46CFR Parts 10 and 15, we would like to make the following suggestions and comments.

Part 10.463 General requirements for licenses for master, pilot, and apprentice steersman of towing vessels.

The WACHD does not believe that horsepower separation should be a criteria for license requirements. We feel that the better criteria would be training skills, practical experience, and knowledge of route. These should prove the applicant's qualifications and nullify any requirement for horsepower restrictions. We feel that this restriction would put undue hardships on companies that operate a variety of horsepower vessels. It would limit their ability to utilize their personnel for the most safe and efficient operations.

Part 10.464 Licenses for masters of towing vessels.

The WACHD will be in opposition to the 48 months of total service time to become a master, if this is meant to be the time frame used between pilot and upgrade to master. With the service requirements for steersman and pilot, we feel that 24 months additional service is long enough to qualify for a masters license. We think that 48 months would restrict industry's ability to advance pilots from within their own company. They would then have to hire outside masters who are not familiar with their operation and would require additional training.

Part 10.464 (a)1ii, 2, 2(b), 2(b)1ii, (b)2, (c) The WACHD opposes any reference to horsepower restrictions in the subparts listed above.

Part 10.464 (c)2 The WACHD does not believe that submitting evidence of practical demonstration of skills in the form of a training and assessment record book, as described in 10.304 (e), would be any better evidence of qualifications than the official documentation and logs from the vessel or vessels on which he/she has served. We feel that if a pilot fulfills the necessary service requirements for a masters license, then he has a permanent record in the form of the vessel log. It shows routes, times, and tows that they have handled. The U.S. Coast Guard would have a record of any accidents or violations which the pilot may have acquired. We feel that two letters of recommendation from active masters under whom he has served and a letter from the company would be sufficient.

10.465 Licenses for mates (pilots) of towing vessels.

10.465 (a), (a)1ii, (a)3, (a)3(b), (a)3(b)3, (a)(c), (a)(d) The WACHD opposes any reference to horsepower restrictions in the subparts listed above.

General Overview:

Demonstration of proficiency. The WACHD does not believe that mandatory use of simulators will better demonstrate proficiency. The best place to demonstrate proficiency is on board an active vessel with a designated examiner. We feel that the simulator should be used as a training tool only.

Designated examiner. The WACHD supports this idea, but feels that it should be a person within the company (i.e., a port captain or experienced master who meets the definition of Designated Examiner in 10.103).

Grand-fathering. The WACHD supports the idea of grand-fathering current license holders, if current license holders will be grand-fathered as masters. Otherwise, this will put undue restrictions on industry's use of personnel.

Responsibility of master and pilot. The WACHD feels that the master should be responsible for the overall operation of his/her vessel and his/her watch - based on a two-watch system, six hours on and six hours off. In addition, the pilot, because of the two-watch system, should be responsible for the safe navigation of his/her own watch, unless following direct orders from the master.

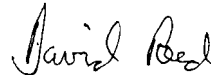
During the comment period regarding licensing proposals, there have been several navigational issues before the towing industry. The WACHD and The Waterways Association of Pittsburgh have been individually and jointly involved in partnering groups and active committees with the U.S. Coast Guard and U.S. Army Corps of Engineers in both the Huntington and Pittsburgh Districts.

The USCG, the USACOE and WACHD formed the Port of Huntington Quality Action team to address barge fleet safety. The WACHD sponsored and helped form a new Kanawha River Improvement Committee to address dock, fleeting and navigation concerns and ways to partner with the USCG and the USACOE. The USCG Port of Huntington and USACOE and the WACHD sponsored a "Fleeting and Best Practices" Seminar. The WACHD, the USCG and the West Virginia Department of Natural Resources sponsored an industry-led initiative to improve recreational boating education and safety. The WACHD helped institute and form an active towboat-riding program for USCG personnel unfamiliar with inland river operations. The WACHD partnered with the Waterways Association of Pittsburgh, the USCG, the USACOE, the National Weather Service and the Ohio River Ice Committee in forming an emergency response team to respond during high river and flood conditions in the upper Ohio River Valley. The WACHD partnered with the USCG to form a team to study and review the new radar regulations. The WACHD, the USCG and the USACOE formed a Natural Working Group to work on navigation aids, safe locking procedures and river navigation map reviews. During this time, these are some of the partnering and committee work groups that were active and they continue to be so.

The WACHD and the Waterways Association of Pittsburgh are navigation-safety concerned organizations located in the Ohio River Valley. Geographically, this area has some of the most active and congested navigation systems in the Inland and Western River Systems. Both organizations have been pro-active in partnering with the U.S. Coast Guard's OCMi and the U.S. Army Corps of Engineers Districts. Surprisingly, neither group was offered an opportunity to join in the process or partner with USCG or TSAC on such a vital and important subject. There were no opportunities for our organizations to participate in any public forum or hearings having explanations or discussions with the USCG regarding these licensing proposals.

Therefore, due to the several complex issues listed in the Federal Register concerning licensing and because of these varying and complex issues and their long-range effect on both the navigation industry and the individual license holder, we request a re-opening of the comment period with it being open for another 180 days. This would allow the WACHD, other concerned groups and individual license holders, who were not invited to participate in the process, time to better understand the proposals and to make suggestions and comments.

Sincerely,



David Reed
Acting Chairman, WACHD

DR:ds

cc: Rear Admiral J. C. Card
U.S. Coast Guard



Midland Enterprises Inc.
300 Pike Street
P.O. Box 1460
Cincinnati, Ohio 45201
(513) 721-4000

October 16, 1996

Executive Secretary
Marine Safety Council (G-LRA/3406) (CGD 94-055)
U.S. Coast Guard Headquarters
2100 Second Street SW.
Washington, DC 20593-0001

RE. Licensing and Manning For **Officers** of Towing Vessels; Proposed Rule

Midland Enterprises Inc., through its operating subsidiaries of the Ohio River Company, **Orgulf** Transport, **Orsouth**, R&W Marine, and Capital Marine Supply, employ approximately 250 licensed pilots to man its fleet of some 75 towing vessels that sail the Mississippi River and tributaries and the Gulf Intracoastal Canal. Many of these individuals hold higher **level** licenses than just an **OUTV**.

We **recognize** the difficult task the U.S. Coast Guard has in changing the rules for licensing and manning for officers of towing vessels, with the intent to truly improve safety in the commercial towing environment. AWO, to which we belong, has made a number of recommendations and comments regarding the new proposed rule which we endorse. There are a few additional points we would like to submit for the record.

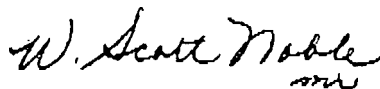
1. Proposed horsepower breakpoint. **While** we understand the struggle to find a horsepower breakpoint, our company, which operates vessels from 1000 HP to over 10,000 HP, develops and advances its licensed people with a much broader evaluation criteria. Because of the unique operating characteristics of all rivers, we require all pilots to get at least one posting trip (have an experienced pilot for the specific area ride **with** them) to get familiar with an area. Significant changes in pilots' tasks such as large increase in vessel size, size tow, or **extreme** river condition **will** result in additional posting. Generally such introduction to a new area is on the pilot's, or back watch.

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2. Steersman Training. The proposed **rule** indicates the steersman is "authorized only to train in the wheelhouse under the continuous, direct supervision and observation of a mariner licensed as master." Our experience and practice has shown that for training to be complete a steersman must be given time alone in the later stages to develop necessary confidence. While the trainer has responsibility to access when and where to allow such soloing, he should **not** be held accountable for gross negligence on the part of the steersman.

Our company has taken steps over the years, which exceed the current regulation and in some instances go beyond the proposed rule, to assure our **pilots** are qualified and **competent** to handle their towing assignments.

Sincerely,



W. Scott Noble
Operations Manager

CC: S. Frasher
6. Ferguson
K Wheeler
M. **Monahan**
B. Compton
G. Menke
R. Thornton
D. White

October 17, 1996

Executive Secretary
Marine Safety Council (G-LRA/3406) (CGD 94-055)
U.S. Coast Guard Headquarters,
Washington, D.C. 20593-0001

RE: Licensing and Manning For Officers of Towing Vessels;
Proposed Rule

I respectfully request a reopening and extended response period of at least 180 days on proposed rule Federal Register June 19, 1996, Part V, CFR 46 Parts 10 and 15, Licensing and Manning Towing Vessels. Also, we Mariners need at least two public meetings in the old Second District.

Several reasons for this request is that within the last four (4) months there has been a rule change for Examiners, Radar Equipment, and Safety Equipment (machinery) reporting, plus other reasons listed below.

THE PROPOSED HORSEPOWER BREAKPOINT - I understand the struggle the Coast Guard is having trying to come up with some way to make the river safer. Each river has its own characteristics and the horsepower of the vessel pushing the tow has little to do with how safe it is. This is one area the license as they are now serves the purpose that was intended. The examination lets the Coast Guard make sure that the person getting the license understand the Rules of the Road and basic navigation. It should be the responsibility of the company to determine what size tow or boat or river a person stands a watch on.

Companies that belong to AWO are working on a Responsible Towing Plan that is to be completed by the end of 1997. My suggestion is the Coast Guard review some of these plans, they may decide that a lot of regulations out there at the present time can be discontinued.

I have been sailing under a Masters License and First Class Pilot with a OUTV, 8 Issues. I have worked all major rivers and all horsepower boats. Due to the shortage of license people, Captains and Pilots are working long hitches, some as much as 70 or 80 days. These pilots have not received any information on this regulation and if they do, cannot understand the proposed regulation completely. This is the main reason I am requesting a reopening with an extended period for comments. In my view the regulation is not needed and attached you will find my reasoning on this matter.

Two years ago in St. Louis, Admiral Card discussed Partnering with the Corp of Engineers and Industry. This was a great idea and it seems to work in most cases. However, it has went by the way side in the formulation of this regulation. I would request if a reopening is granted that a work group of Masters and Pilots with no person higher up in a company than a Port Captain be permitted to be in this group to determine whether this regulation is needed.

Sincerely,


HOWARD R. THORNTON
Port Captain

cc/ Senator Rockefeller
Nick Rahall
Admiral Card
Scott Noble

EXECUTIVE SECRETARY
MARINE SAFETY OFFICE
(G-LRA/3406)[CGD 94-055]
U.S.COAST GUARD HEADQUARTERS
2100 SECOND STREET SW.
WASHINGTON, DC 20593-0001

JAMES A. GEHDE
RR #1 BOX 500-G
LESAGE, WV
25537

TO WHOM IT CONCERNS:

I respectfully request a reopening, and extended response period of as long ~~as~~ possible, on proposed rules Federal Register June 19, 1996 **part V**, 46 CFR Parts **10** and **15**, Licensing and Manning towing vessels. Also many more public meetings in the **old** Second District, and all **C.G.** Districts.

New proposals have very recently been received regarding rules for examiners, radar equipment, and safety equipment, these should be given time to be studied and responded to.

I am concerned about the small amount of working licensed towing vessel operators who are unaware of the proposed rules. Marine Safety broadcasts from Coast Guard groups giving such, should be announcing the public meetings and places, also information on where to obtain the rule proposals.

Admiral Card has been preaching partnering for a couple of years ^{now}, but the people dealing with safety issues every working day seem to have been left out. Licensed towing vessel operators would be the most qualified to supply information to improve safety. We are the most affected by the new proposed rules and should be given ample information and time **to** respond.

Capt. James A. Gehde
Capt. James A. Gehde
1600 ton Licensed Master
Western Rivers

cc: Admiral Card
Nick Rahull
Senator Rockefeller

692

EXECUTIVE SECRETARY
MARINE SAFETY OFFICE
(G-LRA/3406)[CGD 94-055]
U.S.COAST GUARD HEADQUARTERS
2100 SECOND STREET SW.
WASHINGTON, DC 20593-0001

RON L.WARD
RT.1 BOX 524
PROCTORVILLE, OH
45669

TO WHOM IT CONCERNS:

I respectfully request a reopening, and extended response period of as long as possible, on proposed rules Federal Register June 19, 1996 part V, 46 CFR Parts 10 and 15, Licensing and Manning towing vessels. Also many more public meetings in the old Second District, and all C.G. Districts.

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Admiral Card has been preaching partnering for a couple of years now, but the people dealing with safety issues every working day seem to have been left out. Licensed towing vessel operators would be the most qualified to supply information to improve safety. We are the most affected by the new proposed rules and should be given ample information and time to respond,

Thank You,
Ronald L. Ward II
Ronald L. Ward II

cc: Admiral Card
Nick Rahull
Senator Rockefeller

693

17
BANDY Longdon
Rt 1 Box 556
Milton L.V.
25541
10/6/96

Proposed Rules

To Executive Secretary Marine Safety
Council

(G-LRA/3406) [CGD 94-055]
U.S. Coast Guard Headquarters
2100 Second Street SW
Washington D.C. 20593-0001
Dear Sir

I would like to make a few comments
on Rule Making CGD-94055 Requirements
For Licensing

Section I Page 31333 + 31334 Licensing

I think Inland River operators should be
addressed as Master, Pilot, Steersman.
All current licenses should be grandfathered
in any New License requirements.

As far as Horse Power Rating there
shouldn't be any. I think all Companies
should have a training program or
to examine their operators are qualified (694)
They should be trained with a qualified

(Know Master Operator
Should be Responsible For another)

The Master Captain ^{and} Pilot should
be Responsible For his/her own
Catch. The Horse Power of a Vessel
has Nothing to do With Knowing the
River. Which is 70% of this Job.

Horse Power Makes this Job easier
in some Cases of High Water ^{and} Leather
Conditions and Number of Barges.

Section II Page 31334 Requirement For renewal
of Licenses. I opposed Simulator Course

this is going to Fare Concerning Something
that is only a aid to Navigation. This

Job is Knowing the ^{Route} being able to
handle a boat and Tow knowing

the Capability of your Vessel. Radar
can only show limited obstructions

in the Route. I think should Training
Programs Conducted By Port Captain
or Master Captain Operators.

Randy Longdon

(The Horse Power and Radar
does not Make a Pilot
Oversight to be a Captain.)
(This Simulator idea
is ridiculous)

October 12, 1996
Rt. 1 Box 326-A
Alderson, W. V. 24910

Executive Secretary, Marine Safety Council
(G-LRA/3406) [CGD 94-055]
U.S. Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

Dear Sir:

I would like to comment on proposed rulemaking CDG 94-055 - Requirements for Licensing.

Under Section 1

"Holders of current licenses would be grand-fathered into new licenses"

I support this proposal.

"License for master, mate (pilot) or apprentice mate (steersman) of towing vessels"

This terminology is very confusing. I believe classifications should be referred to as master, pilot, and steersman.

"Responsibility of master and pilot"

Based on the two-watch system on the western rivers, I believe the master has the overall responsibility of the vessel. However, I think it is necessary for pilots to be responsible for his/her actions during their watch. If in doubt of a judgement call, the master is available for advice.

Under Section 2

"Requirements for renewal of licenses"

I disagree with the mandatory use of a simulator. With a one-week simulator course costing a proposed \$5,000, this would put an undue financial hardship on me as well as the towing companies. Smaller companies may very well be forced to go out of business.

Under Section 3

"Horsepower as basis of authority"

I do not believe horsepower should be used as a basis of authority. I think skills, knowledge, and experience outweigh horsepower as a basis of authority.

Under Section 5

"Demonstration of proficiency"

I do not believe the simulator can be an accurate judge of proficiency. I believe a designated company master, with at least 10 years experience, would, by far, be a much more reliable judge of proficiency, as well as being a great deal more cost efficient than a simulator.

Proposed Rulemaking (CGD 94-055)

Page 2

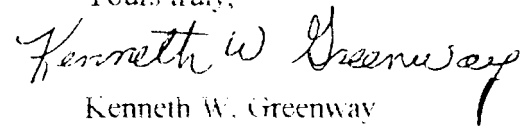
Under Section 8

"Designated examiner"

I think it is a good idea to have a designated examiner. However, I believe the candidate filling this position should have a minimum of 10 years of operational experience rather than the proposed two years.

I appreciate the opportunity to comment on proposed rulemaking (CGD 94-055) and would like these comments to be part of the public docket for this rulemaking.

Yours truly,

A handwritten signature in cursive script that reads "Kenneth W. Greenway". The signature is written in dark ink and is positioned above the printed name and title.

Kenneth W. Greenway
Pilot-AEP

SEAFARERS HARRY LUNDEBERG SCHOOL OF SEAMANSHIP

P.O. Box 75 - State Route 249, Piney Point, MD 20674-0075 * 301/994-0010



October 9, 1996

LCDR Don Darcy
Commandant (G-MSO-1)
U.S. Coast Guard Headquarters
Room 1210
2100 Second Street, S.W.
Washington, DC 20593-0001

LCDR Darcy:

The inland Advisory Board Sub-Committee convened October 2-3, 1996 for the semi-annual meeting at the Seafarers Harry Lundeburg School of Seamanship. The focus of this working group was to discuss and form opinion on CGD 94-055, Licensing and Manning for Officers for Towing Vessels. Attending members included:

Joe Sacco	Seafarers International Union, Headquarters
David Heindel	Seafarers International Union, Philadelphia
John Mason	American Services Technology, Inc.
Bill Eglinton	Seafarers Harry Lundeburg School of Seamanship
J C Weigman	Seafarers Harry Lundeburg School of Seamanship
William Saul	Seafarers Harry Lundeburg School of Seamanship
Phillip Peak	Seafarers Harry Lundeburg School of Seamanship
Casey Taylor	Seafarers Harry Lundeburg School of Seamanship
Alex Sweeney	Crowley Marine Services
Roy Murphy	Kirby Corporation
William Ferguson	Orgulf / Red Circle
Dave Brown	Orgulf / Red Circle
Frank Power	Penn Maritime, Inc.
Gardner Walling	Express Marine, Inc.
Don Ivins	Express Marine, Inc.

The Sub-Committee is putting forth three (3) requests.

1. Extension of the comment Period. Due to the long term impact on the towing industry, we are requesting a ninety (90) day extension to the comment period. This would allow inland and towing interests in the regions mentioned below to asses impact, formulate opinion and submit comment to the docket.

696

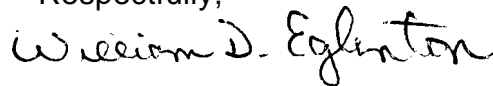


- 2 Additional public meetings. The New Orleans meeting was insufficient to adequately accommodate the concerns of the inland industry nation wide. We request additional public meetings in the west coast, Great Lakes, and east coast regions. Site consideration should be given to Portland, Oregon or Seattle, Washington and a mid-Atlantic location for the east coast.
- 3 NPRM clarification. [[Page 31334]] of the CGD 94-055, para. 3, impact of work hour limitations. The Sub-Committee is requesting timely response (prior to closely of the comment period) defining the "intent" of the question. General consensus on interpretation was impossible based on the information provided regarding indivisibility of the watch, Master responsibility, vessel safety, and existing work hour limitations.

With the exception of item (3) consensus was reached on all other areas of concern. The Sub-Committee comment will be forwarded to the docket for consideration under separate cover.

Should you require additional information or assistance, feel free to contact me at (301) 994-0010 ext. 5270.

Respectfully,



William D. Eglinton
Director Vocational Education